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Honorable Christopher Alston
Chapter 7
Hearing Date: 4/24/2020 at 9:30 am
Response Date: 4/17/20
Location Seattle Rm 7206

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

MOTION

15 COMES NOW THE DEBTOR, by and through his attorney, Erin Lane, and moves the
16 Court pursuant to 11 U.S.C. §554(b) to compel the Chapter 7 trustee in this case to abandon the real
17 property located at 31327 12th Pl S, Federal Way, WA 98003. In support of the motion, the Debtor
18 sets forth facts and respectfully requests the Court to grant relief as follows:

1. Debtor filed petition under Chapter 13 on March 13, 2019.
2. She converted from Chapter 13 to Chapter 7 on July 11, 2019.
3. Pursuant to 11 U.S.C. §541, the Property became property of the bankruptcy estate.
4. The subject property King County tax parcel ID is 787520-0150 and Legal description is Soundcrest Div #2, Plat Block 5, Plat Lot 4.
5. The Property is of inconsequential value to the bankruptcy estate for the following reasons:
 - a. Debtor obtained a Comparative Market Analysis from a realtor on March 5, 2020.

1 b. The realtor valued the house to sell between \$271,500.00 and \$280,000.00 See
2 attached Ex A .
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4 c. A Mortgage Lien of about \$232,109.68 is held by Mr. Cooper leaving between
5 \$47,890.32 - \$39,390.32 of equity. A proof of claim was filed with the court on May
6 13, 2019 as Claim #4 in her chapter 13.
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8 d. Debtor has claimed a homestead exemption of \$125,000.00 leaving \$0 of equity for
the bankruptcy estate.
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10 6. Debtor therefore respectfully asserts that an order of abandonment is appropriate.

11 WHEREFORE, Debtor requests the entry of an order of abandonment of the Property from the
bankruptcy estate pursuant to 11 U.S.C. §554(b) and for such other and further relief as is just.

12 _____
13 */s/Erin Lane*
14 Erin Lane, WSBA #42504
15 Attorney for Debtor
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